

(128TC-L/T)

LAC 23-08-J.008 - Privileged and Confidential - Settlement Communication

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE ESTATE OF MARTÍN RAMÍREZ,
by its duly appointed co-administrators and
personal representatives,
MARTÍN RAMÍREZ SALINAS and MARIA
DE JESÚS RHYES RAMÍREZ MILLER,
Plaintiffs,
v.
MAURREEN HAMMOND
and
SOTHEBY'S, INC.,
Defendants.

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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/2/08

(PAC)
Case No. 08 Civ. 7103 (JRC)

STIPULATION
AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED, AS AND AMONG THE PARTIES,
AND ORDERED BY THE COURT:

1. Defendant Sotheby's, Inc. ("Sotheby's") shall release the 17 works of art
by Martin Ramírez currently in its possession (the "Property") and subject to dispute in
this action only as directed by an order of the Court (including any other federal or state
court to which this action may be transferred), but shall not relinquish possession or
control of, or transfer, assign, release or otherwise dispose of, the Property until so
directed by an order of the Court.

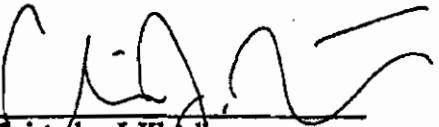
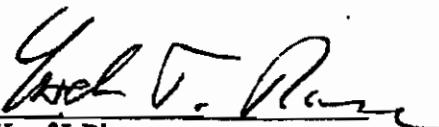
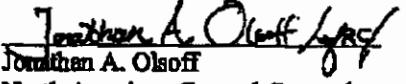
2. Sotheby's is hereby discharged from any and all liability to the other
parties in this action and is dismissed from this action and any related actions, with

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prejudice, as a party, having hereby waived its right to seek costs and attorneys' fees and indemnity as provided by statute, contract, rule, and common law.

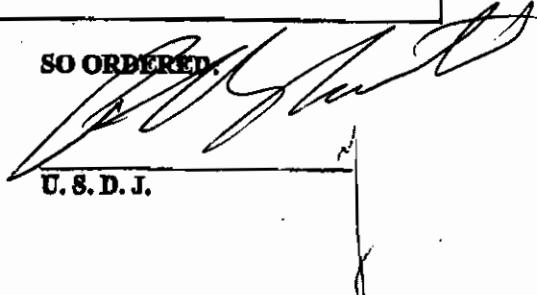
3. This Stipulation may be executed in one or more counterparts. All executed counterparts and each of them shall be deemed to be one and the same.

Dated: August 27, 2008

RABINOWITZ, BOUDIN, STANDARD, KRINKSY & LIEBERMAN, PC  Christopher J. Klaat 111 Broadway, 11 th Floor New York, New York 10006 212.254.1111 <i>Attorneys for Plaintiff</i>	KIRKLAND & ELLIS LLP  Yosef J. Riemer 153 East 53 rd Street New York, New York 10022 212.446.4800 <i>Attorneys for Defendant Hammond</i>
SOtheby's, Inc.  Jonathan A. Olsoff North American General Counsel Senior Vice-President 1334 York Avenue NY, NY 10021 212.606.7432	

Dated: 9-2, 2008

SO ORDERED,


U. S. D. J.